

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )

FOG 111 000M

Computer III Further Remand Proceedings: )

CC Docket No. 95-20

Bell Operating Company Provision of Enhanced Services )

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REPLY COMMENTS

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Vice President, Intelligent Network Products  
GeoNet Limited, L.P.

DATE: May 19, 1995

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**I. INTRODUCTION**

GeoNet Limited, L.P. in its comments filed March 7, 1995 and in its reply comments filed May 2, 1995 raised concerns about the reluctance of the Tier 1 companies to provide sufficient technical information on their network architecture planning. In our comments we stated that our experience in the IILC is evidence that such reluctance to disclose technical descriptions of network architecture plans impedes the efforts of enhanced service providers (ESPs) to create the advanced services which will utilize new technologies such as Signalling System #7 (SS7), Integrated Services Digital Network (ISDN), and the Advanced Intelligent Network (AIN). We described how the result of such reluctance diminishes the IILC and 120 day processes which are intended to facilitate equal access by ESPs to the functionality of those new technologies.

**Recently, the Inter-Industry Advisory Group (IAG) of the Information Industry Liaison Committee (IILC) issued its response to GeoNet's concerns.**

**GeoNet submits that our recommendation in our comments under this docket, "that the Commission should review the practices of the Tier 1 companies with respect to disclosure of network architecture plans" is further justified by the IILC IAG response. In the response, the IILC IAG states, "In the case of Issue #044, the record makes it apparent that some participants, e.g., some LECs, do not believe it is necessary to share their network plans in detail to reach resolution on this issue, as long as they are in general agreement with the direction being taken by the Task Group." GeoNet agrees that the quoted statement is a correct summary of the record. However, GeoNet contends that the IILC process is damaged by such an attitude on behalf of some of the Tier 1 companies. When dealing with issues involving new technologies, the process cannot produce meaningful results without knowledge of the technical and functional descriptions of the architectures being deployed by the network providers.**

**GeoNet has no evidence of any ulterior motive for such reluctance to disclose network architecture planning information. However, we cannot see any valid reason for such behavior. Again, we urge the Commission to consider the urgency of this issue of disclosure in light of the national interest in developing a robust and powerful national telecommunications infrastructure.**

**A copy of the IILC IAG response which has been quoted in these reply comments is included for the record.**

**We thank you for the opportunity to enter our reply comments into the record.**

**Respectfully submitted,**

**GeoNet Limited, L.P.**

By:   
**C. Donald Berteau**

**Vice President, Intelligent Network Products**

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Alliance for Telecommunications  
Industry Solutions

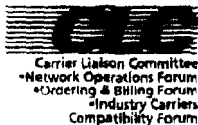
Formerly the Exchange Carriers Standards Association

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#### COMMITTEES



May 17, 1995

Post-It™ brand fax transmittal memo 7671		# of pages > 3
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Mr. C. Donald Berteau  
Vice President, Intelligent Network Products  
GeoNet, Limited, L.P.  
3339 Cardinal Drive  
Suite 200  
Vero Beach, Florida 32963

Dear Mr. Berteau:

Re. Interindustry Advisory Group (IAG) Response to GeoNet, Ltd. Regarding GeoNet, Ltd.'s Request for Intervention in Issue #044

GeoNet, Ltd. has asked that the Interindustry Advisory Group (IAG) of the Information Industry Liaison Committee (IILC) intervene in the resolution of IILC Issue #044, *Advanced Intelligent Network (AIN) Access by Non-LEC Resource Element*, and respond as to how it might resolve GeoNet's concern that there has been a lack of full participation in the issue by all the Local Exchange Carriers (LECs) participating in the IILC.

GeoNet has stated that it is not bringing this request as an issue of procedural fairness, since it appears that the IILC members are operating within the procedural guidelines of the IILC. The IAG has reviewed the record to date on Issue #044 and found that GeoNet has been provided every opportunity to participate in task group and IILC meetings, to articulate its views, and have those views documented, and agrees that GeoNet has been afforded procedural due process consistent with the By-Laws of the IILC.

The IAG's understanding is that GeoNet equates full participation in the Issue #044 resolution process with each LEC providing technical contributions on its network architecture plans during issue investigation, and that any resolution based on the Advanced Intelligent Network (AIN) designs of only a limited number of the LECs cannot be a satisfactory resolution of Issue #044. GeoNet has declared that only a solution to which all LECs subscribe would satisfy its definition of a national uniform solution.



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GeoNet recognizes that participation in the IILC is voluntary and that the IILC By-Laws contain no requirement that participants investigating an issue must contribute materially to the issue documentation in order to promote resolution of an issue.

The IAG acknowledges GeoNet's observation that when an IILC participant volunteers to work on a Task Group that action should carry with it a commitment to make meaningful contribution to that Task Group. In the case of Issue #044, as stated before, GeoNet believes that a meaningful contribution requires technical input from those LECs who are in the process of network design for the Advanced Intelligent Network.

GeoNet initially came to the IAG in July 1994, concerned that an Issue #044 sub-Task Group was not getting sufficient engineering/technical support. At that time, the IAG recommended that the full Task Group rather than the sub-Task Group should address the technical issues in question.

GeoNet's appeal for IAG intervention at this time, however, is based on its belief that the voluntary guidelines of the IILC will not result in producing a satisfactory resolution of Issue #044. Indeed, the IILC By-Laws require that the IAG, in its role of monitoring progress of issues being worked in Task Groups, assure that issues are discussed and worked in an open and thorough manner consistent with the needs of all IILC participants. In the case of Issue #044, the record makes it apparent that some participants, e.g., some LECs, do not believe it is necessary to share their network plans in detail to reach resolution on this issue, as long as they are in general agreement with the direction being taken by the Task Group.

In response to the request from GeoNet, Ltd. for IAG intervention in Issue #044, the IAG finds that no provision in the IILC By-Laws or Administrative Procedures has been violated and that no issues of procedural fairness have been raised.



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In regard to GeoNet, Ltd.'s belief that IILC issue resolution necessitates technical contributions from companies or individuals, the IAG reiterates that participation in the IILC is voluntary in nature and therefore that no party can be compelled to contribute to an issue.

The IAG believes, following its review of Issue #044 and within its responsibilities as delineated in the IILC By-Laws, that there is no further action it can take at this time.

Respectfully,

A handwritten signature in cursive script that reads 'Mike Drew'. The signature is written in black ink and is positioned above the printed name and title.

Mike Drew  
IAG Co-Chairperson

cc: IAG Representatives and Alternates